

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

Emelia Mugambiwa,
(Baltimore City)

c/o Latham & Watkins
555 Eleventh Street, NW, Suite 1000
Washington, DC 20004

Plaintiff,

v.

Peter Chiweshe, and

1243 Taylor Avenue
Arnold, MD 21012
(Anne Arundel County)

Shingaidzo Nhekairo

1243 Taylor Avenue
Arnold, MD 21012
(Anne Arundel County)

Defendants.

Civil Action No.: 1:17-cv-02541-CCB

JURY TRIAL REQUESTED

NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff, by and through undersigned counsel, hereby voluntarily dismisses without prejudice the above-captioned action.

In support, Plaintiff states as follows:

1. On September 1, 2017, Plaintiff filed the Complaint. ECF No. 1.

2. Plaintiff has not yet served the Complaint on Defendants, and as such, Defendants have not filed an answer to the Complaint or a motion for summary judgment.

3. Since the filing of the Complaint, the parties have engaged in settlement negotiations, executed a Tolling and Standstill Agreement, and expect to conduct a voluntary, non-binding mediation in early 2018.

4. Accordingly, in order to facilitate settlement negotiations and avoid burdening the Court with this dispute while settlement negotiations are ongoing, Plaintiff voluntarily dismisses this action without prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i).

Dated: December 1, 2017

/s/ Jonathan C. Su
Jonathan C. Su (Bar #16965)
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Attorneys for Plaintiff
Emelia Mugambiwa

CERTIFICATE OF SERVICE

I, Jonathan C. Su, hereby certify that on December 1, 2017, a copy of the foregoing document filed through the CM/ECF system, will be sent via electronic mail to counsel for Defendants, Jeffrey M. Prokop and Gregory D. Beaman of Orrick, Herrington & Sutcliffe LLP, at jprokop@orrick.com and gbeaman@orrick.com.

/s/ Jonathan C. Su

Jonathan C. Su